

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

) Criminal No. 8:17-CR-137 (MAD)

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Indictment

1

) Violations: 21 U.S.C. §§ 846, 841(a)(1),

) 841(b)(1)(B), 841(b)(1)(C)

) [Conspiracy to Possess with

) Intent to Distribute and

Distribute a Controlled

¹⁰ See *Substance]; 21 U.S.C.*

§§ 841(a)(1), (b)(1)(C)

Possession with Intent to Distribute - Controlled Substances

Distribute a substance

1

384

1

1

GRANT, HIRSHLICH & CO.

TABLE 1

COUNT 1
**[Conspiracy to Possess with Intent to Distribute
and to Distribute a Controlled Substance.]**

Between in or about June 2016 and May 25, 2017, in Clinton County in the Northern District of New York, and elsewhere, the defendants, **KYLE TOUCHSTONE, MELISSA KUSALONIS**, aka "Mal," "Liza," [REDACTED]

and CHARLES [REDACTED]
ADAMS, aka "Chuck," and others known and unknown conspired to knowingly and
intentionally possess with intent to distribute and to distribute a controlled substance, in violation
of Title 21, United States Code, Sections 846 and 841(a)(1). As to defendants, **KYLE**
TOUCHSTONE, MELISSA KUSALONIS, aka "Mel," "Liss," [REDACTED]

[REDACTED] and CHARLES

ADAMS, aka "Chuck," that violation involved one hundred (100) grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B). As to defendants [REDACTED]

[REDACTED] and [REDACTED] that violation involved heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 2
[Possession with Intent to Distribute a Controlled Substance]

On or about May 25, 2017, in Essex County in the Northern District of New York, the defendant, CHARLES ADAMS, aka "Chuck," knowingly and intentionally possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

ALLEGATIONS REGARDING PREVIOUS FELONY DRUG CONVICTIONS

The defendants, KYLE TOUCHSTONE and [REDACTED]

[REDACTED] are subject to increased punishment, pursuant to Title 21, United States Code, Section 841(b)(1)(B), because of the following prior convictions for felony drug offenses which have become final:

KYLE TOUCHSTONE was convicted in the County Court for Clinton County, New York, of Criminal Sale of a Controlled Substance in the Third Degree, in violation of N.Y. Penal Law § 220.39(1), a class B felony, on or about March 20, 2013, and sentenced to 3 years of imprisonment and 2 years of post-release supervision on or about May 30, 2013.

[REDACTED] was convicted on or about [REDACTED]

[REDACTED]

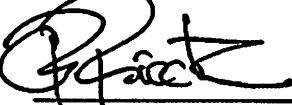
Dated: June 14, 2017

A TRUE BILL,

*name redacted

Grand Jury Foreperson

RICHARD S. HARTUNIAN
United States Attorney

By: 

Cyrus P.W. Rieck
Katherine Kopita
Assistant United States Attorneys
Bar Roll Nos. 518933, 517944